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UNITED STATES BANKRUPTCY COURT

DISTRICT OF NEVADA

In Re:) Case No. BKS-21-13343-nmc
) Chapter 13
)
) Hearing Date: December 29, 2021
Cynthia L. Garcia,) Hearing Time: 1:30 PM
)
)
Debtor(s).)
)
)
)

DEBTOR'S OPPOSITION TO MOTION FOR
RELIEF FROM AUTOMATIC STAY

COMES NOW, Cynthia L. Garcia, by and through attorney, George Haines, Esq., FREEDOM LAW FIRM, LLC, and in response to **Carvana (creditor)**, Motion for Relief from Automatic Stay states as follows:

1. On June 30, 2021, Debtor filed the current Chapter 13 Petition in Bankruptcy with the Court.
2. On or about November 23, 2021, Creditor filed a Motion for Relief from the Automatic Stay with respect to property: 2017 Ford Focus, stating the client is \$862.00 in arrears.

WHEREFORE, debtor requests:

Carvana's Motion be continued for a sufficient amount of time to permit debtor to have a plan filed to resolve the matters stated above.

1. Such other relief as the Court finds appropriate.

Dated: November 30, 2021

/s/George Haines, Esq.
George Haines, Esq.
Attorney for Debtor(s)